

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:23-CV-24299-MORENO/OTAZO-REYES

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

vs.

AMOR DE JESUS, CORP.,
SWEET LIVING FACILITY INC.,
JOSE MACHADO,
ZELMIRA QUINONEZ, AND
AMINTA QUINONEZ,

Defendants.

/

PLAINTIFF'S REQUESTS FOR ADMISSIONS
TO DEFENDANT, AMOR DE JESUS, CORP. CORP

Plaintiff, Maria Elena Chavez Letona, pursuant to Fed. R. Civ. P. 26, 36, and other applicable Rules and laws, requests that Defendant, Amor de Jesus, Corp., admit or deny the following within 30 days hereof:

- 1) Admit that Amor de Jesus, Corp. engaged in interstate commerce in 2020.
- 2) Admit that Amor de Jesus, Corp. engaged in interstate commerce in 2020.
- 3) Admit that Amor de Jesus, Corp. engaged in interstate commerce in 2021.
- 4) Admit that Amor de Jesus, Corp. engaged in interstate commerce in 2022.
- 5) Admit that Amor de Jesus, Corp. engaged in interstate commerce in 2023.
- 6) Admit that Amor de Jesus, Corp. had gross annual revenues exceeding \$500,000 for calendar year 2020.
- 7) Admit that Amor de Jesus, Corp. had gross annual revenues exceeding \$500,000 for

calendar year 2021.

- 8) Admit that Amor de Jesus, Corp. had gross annual revenues exceeding \$500,000 for calendar year 2022.
- 9) Admit that Amor de Jesus, Corp. had gross annual revenues exceeding \$500,000 for calendar year 2023.
- 10) Admit that Amor de Jesus, Corp. did not pay Plaintiff overtime wages calculated at one and one-half times her regular rate of pay (of at least the applicable Florida minimum wage) in calendar year 2020.
- 11) Admit that Amor de Jesus, Corp. did not pay Plaintiff overtime wages calculated at one and one-half times her regular rate of pay (of at least the applicable Florida minimum wage) in calendar year 2021.
- 12) Admit that Amor de Jesus, Corp. did not pay Plaintiff overtime wages calculated at one and one-half times her regular rate of pay (of at least the applicable Florida minimum wage) in calendar year 2022.
- 13) Admit that Amor de Jesus, Corp. did not pay Plaintiff overtime wages calculated at one and one-half times her regular rate of pay (of at least the applicable Florida minimum wage) in calendar year 2022.
- 14) Admit that patients resided at Amor de Jesus, Corp. in 2020.
- 15) Admit that patients resided at Amor de Jesus, Corp. in 2021.
- 16) Admit that patients resided at Amor de Jesus, Corp. in 2022.
- 17) Admit that patients resided at Amor de Jesus, Corp. in 2023.
- 18) Admit that sick persons resided at Amor de Jesus, Corp.'s facility/home in 2020.
- 19) Admit that sick persons resided at Amor de Jesus, Corp.'s facility/home in 2021.

- 20) Admit that sick persons resided at Amor de Jesus, Corp.'s facility/home in 2022.
- 21) Admit that sick persons resided at Amor de Jesus, Corp.'s facility/home in 2023.
- 22) Admit persons over 70 resided at Amor de Jesus, Corp.'s facility/home in 2020.
- 23) Admit persons over 70 resided at Amor de Jesus, Corp.'s facility/home in 2021.
- 24) Admit persons over 70 resided at Amor de Jesus, Corp.'s facility/home in 2022.
- 25) Admit persons over 70 resided at Amor de Jesus, Corp.'s facility/home in 2023.
- 26) Admit persons over 80 resided at Amor de Jesus, Corp.'s facility/home in 2020.
- 27) Admit persons over 80 resided at Amor de Jesus, Corp.'s facility/home in 2021.
- 28) Admit persons over 80 resided at Amor de Jesus, Corp.'s facility/home in 2022.
- 29) Admit persons over 80 resided at Amor de Jesus, Corp.'s facility/home in 2023.
- 30) Admit persons with diminished mental capacity resided at Amor de Jesus, Corp.'s facility/home in 2020.
- 31) Admit persons with diminished mental capacity resided at Amor de Jesus, Corp.'s facility/home in 2021.
- 32) Admit persons with diminished mental capacity resided at Amor de Jesus, Corp.'s facility/home in 2022.
- 33) Admit persons with diminished mental capacity resided at Amor de Jesus, Corp.'s facility/home in 2023.
- 34) Admit that Amor de Jesus, Corp. maintained records of each day that Plaintiff worked for it in 2020.
- 35) Admit that Amor de Jesus, Corp. maintained records of each day that Plaintiff worked for it in 2021.
- 36) Admit that Amor de Jesus, Corp. maintained records of each day that Plaintiff worked for

it in 2022.

- 37) Admit that Amor de Jesus, Corp. maintained records of each day that Plaintiff worked for it in 2023.
- 38) Admit that Amor de Jesus, Corp., has records identifying the hours per day that Plaintiff worked for it in 2020.
- 39) Admit that Amor de Jesus, Corp., has records identifying the hours per day that Plaintiff worked for it in 2021.
- 40) Admit that Amor de Jesus, Corp., has records identifying the hours per day that Plaintiff worked for it in 2022.
- 41) Admit that Amor de Jesus, Corp., has records identifying the hours per day that Plaintiff worked for it in 2023.
- 42) Admit that Amor de Jesus, Corp., has records identifying the hours per week that Plaintiff worked for it in 2020.
- 43) Admit that Amor de Jesus, Corp., has records identifying the hours per week that Plaintiff worked for it in 2021.
- 44) Admit that Amor de Jesus, Corp., has records identifying the hours per week that Plaintiff worked for it in 2022.
- 45) Admit that Amor de Jesus, Corp., has records identifying the hours per week that Plaintiff worked for it in 2023.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by email on this 8th day of January 2024 on Emmanuel Perez, Esq., perez@lawperez.com and courtmail@lawperez.com, as *Counsel for Defendants*, Law Offices of Emmanuel Perez & Associates, P.A., 901 Ponce De Leon Boulevard Suite 101, Coral Gables Florida 33134.

s/Brian H. Pollock, Esq.
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Counsel for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

v.

CASE NO.: 23-CV-24299

AMOR DE JESUS CORP., et al.,

Defendants.

/

DEFENDANT, AMOR DE JESUS, CORP., RESPONSE TO PLAINTIFF'S REQUEST FOR ADMISSIONS

COMES NOW, Defendant, AMOR DE JESUS, CORP., by and through undersigned counsel and pursuant to the Florida Rules of Civil Procedure, files this, Response to Plaintiff's Request for Admissions, as follows:

1. Admits.
2. Admits.
3. Admits.
4. Admits.
5. Admits.
6. Denies.
7. Denies.
8. Denies.
9. Denies.
10. Denies.
11. Denies.
12. Denies.
13. Denies.
14. Denies.
15. Denies.
16. Denies.
17. Denies.

18. Denies.
19. Denies.
20. Denies.
21. Denies.
22. Admits.
23. Admits.
24. Admits.
25. Admits.
26. Admits.
27. Admits.
28. Admits.
29. Admits.
30. Denies.
31. Denies.
32. Denies.
33. Denies.
34. Denies.
35. Denies.
36. Denies.
37. Denies.
38. Denies.
39. Denies.
40. Denies.
41. Denies.
42. Denies.
43. Denies.
44. Denies.
45. Denies.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing pleading has been electronically filed and served via EM/ECF on this 8th day of February 2024.

**LAW OFFICES OF
EMMANUEL PEREZ & ASSOCIATES, P.A.
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By: /s/Emmanuel Perez
EMMANUEL PEREZ
F.B.N. 586552